



## Association of California Water Agencies

Leadership Advocacy Information Since 1910

6/19/07 BdMtg Item 10

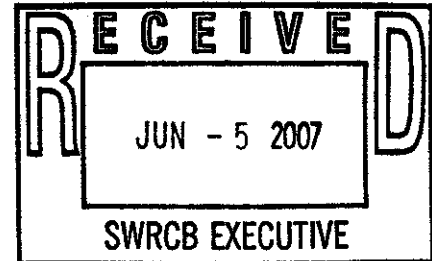
WR Enforcement

Deadline: 6/6/07 Noon

June 1, 2007

*Via Email (commentletters@waterboards.ca.gov)*

Attention: Song Her, Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



**Re: June 19, 2007 Water Right Enforcement Workshop**

To the Members of the State Water Resources Control Board:

The Association of California Water Agencies (ACWA) supports the development of a State Water Resources Control Board Water Right Enforcement Policy that provides predictable, consistent and fair enforcement to ensure compliance with water rights laws and efficient administration of the State's water rights permitting system.

ACWA is a voluntary, statewide nonprofit association comprised of 440 public water agencies that was founded in 1910. Together these agencies are responsible for more than 90 percent of the water delivered in the state. ACWA member agencies range in size from small irrigation districts to the largest urban water wholesalers in the country. ACWA member agencies manage, treat and distribute water to rural communities, farms, industries, and cities. ACWA represents its members before the state Legislature, the United States Congress and numerous regulatory bodies including the State Water Resources Control Board.

ACWA strongly suggests that the Enforcement Policy be developed as part of a comprehensive workshop analyzing the problems affecting water rights administration in general. Many of the problems cited in the Enforcement Policy workshop notice are systemic problems inherent in the water rights administration system, and an enforcement policy will fail if the root causes of noncompliance with water rights laws and inefficiencies in water rights administration are not first identified, carefully analyzed, and remedied. We believe that the fundamental problems affecting the water rights system dictate that enforcement actions focus on efforts to enable and encourage voluntary compliance, rather than placing undue emphasis on punishment of noncompliance.

State Water Resources Control Board

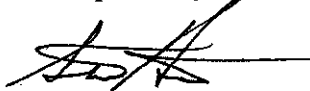
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ACWA supports the efforts of numerous water rights attorneys and engineers who represent ACWA members to provide information and to make recommendations regarding the Enforcement Policy, including their recommendation that the Enforcement Policy workshop should be expanded to address problems affecting the water rights administration system. ACWA thanks the State Board for carefully considering these recommendations, and looks forward to participating both in the June 19, 2007 workshop and in subsequent activities concerning the development of the Enforcement Policy.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. K. Hall", with a horizontal line extending to the right.

Stephen K. Hall  
Executive Director